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1 A Yes.

2 Q Did you do any kind of history of Korey Stringer?

3 A No.

4 Q Did you do, other than what you've described, any  
5 procedures?

6 A No, at that time, the time you're talking. You've  
7 narrowed this in the trailer at that time?

8 Q I'm talking in the trailer, yes.

9 A Yes.

10 Q Did you ask anything of D.J. Kearney?

11 A I was. I guess -- no.

12 Q Did you ask anything of Paul Osterman?

13 A No.

14 Q Did you know anything about how long Korey  
15 Stringer had been in the trailer?

16 A I knew that he had walked into the trailer.

17 Q But did you know what time he walked into the  
18 trailer?

19 A No.

20 Q So you're in this trailer --

21 A Yes.

22 Q -- and other than telling D.J. Kearney to put the  
23 bag on Korey Stringer's face and then telling D.J.  
24 Kearney to take the bag off and telling Paul to go  
25 make some phone calls and go see the ambulance,

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1 did you talk to anybody? Oh, you talked to Dr.  
2 Knowles.

3 A Yes.

4 Q Anybody else?

5 A No.

6 Q Did you describe the symptoms to Dr. Knowles?

7 A I knew that we had a serious situation.

8 Q Did you describe the symptoms to Dr. Knowles?

9 A No. I got off that phone to get back in that  
10 trailer room. And he --

11 MR. O'NEAL: Okay. You've answered her  
12 question.

13 BY MS. ROSELLE:

14 Q Did Dr. Knowles say anything to you like that  
15 Korey had been sick the day before?

16 A No.

17 Q Now, you say you were very busy in the trailer.

18 A I thought so, yes.

19 Q What else were you doing, other than what you've  
20 described?

21 A Observation, trying to keep the scene calm.

22 Q You've described to me what you observed when you  
23 first got in and what you observed when you put  
24 the bag over -- when D.J. put the bag over Korey's  
25 face. What else did you observe while you were in

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1 the trailer?

2 A When I first came in, that he was hyperventilating  
3 and he had -- his neck was moving anteroposterior,  
4 posteroanterior.

5 Q Anything else you had observed?

6 A He had had his socks off, his tape off, his shoes  
7 off, his helmet off, his shoulder pads off, his  
8 jersey off.

9 Q Anything else you observed?

10 A No.

11 Q Did you consider taking the rest of his clothes  
12 off so his body could cool down?

13 A He did not feel hot to me.

14 Q So the answer is no?

15 A No.

16 Q It's your testimony that you took no steps  
17 whatsoever to treat him for a heat-related  
18 illness; is that correct?

19 A I did not know he had a heat-related injury. I  
20 know what you want me to say. Did I take any  
21 steps?

22 MR. O'NEAL: To treat for a  
23 heat-related injury. That was the question.

24 A No.

25 Q Now, during the time that you were waiting for the

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1 ambulance, you just stayed in the trailer, you  
2 monitored Korey's breathing, and you waited; is  
3 that correct?

4 MR. O'NEAL: Object to the question as  
5 argumentative. Specifically, the term "just."  
6 You can answer it if you can.

7 A She had a lot of sequence in there. I don't know  
8 if you mentioned that I went out and talked to Dr.  
9 Knowles.

10 Q You talked to Dr. Knowles before you called for  
11 the ambulance, correct?

12 A Yes.

13 Q Okay. Once the ambulance is called --

14 A Yes.

15 Q -- did you go back in the trailer?

16 A Yes.

17 Q After the ambulance is called and before the  
18 ambulance arrived, tell me everything you  
19 remembered doing in the trailer?

20 A Well, I remember a player--I assume he was a  
21 player. He was a large black man. I don't know  
22 who he was--walked into the front door and he was  
23 standing there with the door open and I told him,  
24 "Out. Out. Out."

25 Q Anything else that you recall doing?

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1 A No, except continuing to monitor airway,  
2 breathing, and circulation.

3 Q And have you told me everything you did to  
4 continue to monitor airway, breathing, and  
5 circulation?

6 A Yes.

7 Q Were you sitting on the floor with Korey?

8 A At times -- I was not sitting on the floor, but at  
9 times, I was bent down over him and I believe I  
10 was on a knee, occasionally.

11 Q Did you take any steps to assess to determine  
12 whether or not Korey had a heat-related injury?

13 A Other than what I observed at the moment.

14 Q So your answer is no?

15 A No.

16 MR. O'NEAL: I think his answer wasn't  
17 clear: What he observed at the moment, no.

18 BY MS. ROSELLE:

19 Q What did you observe at the moment?

20 MR. O'NEAL: Objection. Repetitious.

21 A The breathing, the head movement, his position,  
22 the clothes that had been removed.

23 Q Did you ask anybody what Korey had drunk?

24 A No.

25 Q How much time passed between the time you told

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1 Paul to call for the ambulance and the time the  
2 ambulance appeared?

3 MR. O'NEAL: Objection. Lack of  
4 foundation.

5 A I don't know.

6 Q Do you think it was approximately nine or ten  
7 minutes?

8 MR. O'NEAL: Same objection.

9 A I don't know.

10 Q Okay. Would you turn, please, to Exhibit 64?

11 A 64. Which one is it?

12 Q It's the Gold Cross Ambulance.

13 A Oh, okay.

14 Q Do you see on the first line, it says,  
15 "Dispatched, 12:00"?

16 A Yes.

17 Q And do you see it says, "On Scene, 12:08"?

18 A Yes.

19 Q And then something, "12:09"?

20 A Yes.

21 Q Okay. Do you have any reason to disagree that it  
22 was approximately eight or nine minutes between  
23 the time the ambulance was called and the time the  
24 ambulance arrived?

25 A I don't know that. I can't -- that's their

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1 A No.

2 Q Anything else you recall D.J. doing in the  
3 trailer?

4 A I don't remember.

5 Q Let's go back to the plastic bag. You asked D.J.  
6 to take one of the plastic bags that was on the  
7 floor; is that right?

8 A That was sitting there. I don't know if it was on  
9 the floor or if it was near the table or where it  
10 was, but I asked Paul Osterman to do that. I  
11 believe I asked Paul or I asked somebody to do it.  
12 Whether D.J. did it -- I know it was in D.J.'s  
13 hand. They emptied the bag, shook the bag, took  
14 it over and we used the bag.

15 Q Okay. Can you tell me how the bag was placed on  
16 his face?

17 A I thought it was -- with his head movements and  
18 everything, I thought it was placed loosely on his  
19 face.

20 Q Over what part of his face?

21 A Over his nose and mouth.

22 Q Did you do any kind of an assessment to see if he  
23 had a heat-related illness?

24 MR. O'NEAL: Objection. Asked and  
25 answered.

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1 MR. ALSOP: Object as repetitive.

2 BY MS. ROSELLE:

3 Q Other than what you've said?

4 A No, no, other than what I said.

5 Q Okay. Now, at some point, the ambulance arrives,  
6 correct?

7 A Yes.

8 Q Tell me what you recall of the time the ambulance  
9 drivers are there?

10 A I heard the ambulance siren and I ran out the door  
11 to wave them to hurry to come in, to move quickly.

12 Q Okay. Then what do you recall next?

13 A They came in and I said to them, "We need to  
14 get -- we need to hurry."

15 Q Why did you say that?

16 A I just felt that it was a condition should be in  
17 the hands of -- at the hospital.

18 Q So by this point, you realized there was some  
19 urgency?

20 A Yes.

21 Q When do you think you first realized there was  
22 some urgency?

23 A When we called the ambulance.

24 Q So up until the time you called the ambulance, you  
25 didn't feel a sense of urgency?

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1 A Oh, yes. I felt there was a sense of urgency or I  
2 wouldn't have called the van or I wouldn't have  
3 called the doctor.

4 Q Okay. So you told the ambulance drivers to hurry?

5 A I said, "We've got to hurry."

6 Q Even though you didn't know what was wrong, by  
7 this point, you thought there was an urgency?

8 A Right.

9 Q Okay. And then what happened?

10 A The ambulance drivers took a look at him.

11 Q Okay.

12 A And they decided that they were going to take  
13 him -- they were going to the hospital and they  
14 were going to bring in the cart. And I said,  
15 "It's going to be difficult. Let's just use a  
16 backboard that's right here, put him on the  
17 backboard. We can take him right outside the  
18 door, put him on the cart, and then go."

19 Q And that's what you did?

20 A Yes.

21 Q Did you have any other discussions with the  
22 ambulance drivers?

23 A My assumption at that time was once the paramedics  
24 arrived, they were in charge.

25 Q Did they ask you any questions?

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1 A I don't recall that.

2 Q Did you tell them anything else?

3 A No.

4 Q Do you recall any discussions, while the ambulance  
5 drivers were there, about heat?

6 A I don't remember that.

7 Q Did they ask you anything about what he had been  
8 doing?

9 A No.

10 Q Did they put an IV in him?

11 A No.

12 Q Did they use an Ambu bag?

13 A Not at that time.

14 Q So while you were in the trailer, all they did was  
15 put him on a backboard and get him out of there?

16 A Right. And they examined him.

17 Q What did the examination consist of?

18 A I think visual and palpation. They were bent  
19 over. I wasn't there. I was -- while that was  
20 going on here, I know the van had arrived and I  
21 didn't want him to leave because I wanted to be  
22 able to go to the hospital.

23 Q So you went outside and talked to the van driver?

24 A I told somebody -- I think I either told Paul or  
25 somebody to make sure that they didn't leave and

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1 A He sat on the edge of the table.

2 Q That was one of the training tables?

3 A Yes.

4 Q Did you give him anything to drink?

5 A No.

6 Q Did anyone give him anything to drink?

7 A I don't remember that.

8 Q What next do you --

9 A Wait a minute. I've got to back up. Chuck Barta  
10 came into the training room with Korey, so that  
11 would make the number six.

12 MR. O'NEAL: Well, not when Dr. Knowles  
13 arrived. That was the question.

14 THE WITNESS: Oh, okay.

15 BY MS. ROSELLE:

16 Q Chuck Barta brought Korey into the trailer,  
17 correct?

18 A Right.

19 Q And then Chuck Barta left?

20 A Yes.

21 Q Did Chuck Barta say anything to you before he  
22 left?

23 A No. He was busy over there administering with  
24 Korey.

25 Q Did you see him do anything with Korey?

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1 A My back was to him.

2 Q So you don't know if he did anything with Korey?

3 A No.

4 Q So then Chuck Barta leaves; Korey sits on the edge  
5 of the table. What did you observe next?

6 A Well, we had the conversation and I saw him  
7 sitting there kind of relaxed.

8 Q Did anybody do anything for Korey?

9 A Well, I observed that he was rational; that he was  
10 not sick to his stomach or vomiting. He was not  
11 having any heat cramps. When he walked in, he  
12 was -- his gait was not affected. That's it.

13 Q Was he sweating?

14 A Well, it was a warm day. I assume everybody was  
15 sweating.

16 Q Did you observe whether or not his skin was wet?

17 A Well, yeah, he had sweat on him and his jersey was  
18 wet.

19 Q Did you have an understanding of why he came in  
20 the trailer?

21 A I thought that he was having some distress out  
22 there of some kind. That's why they would bring  
23 him in.

24 Q Did you make any other observations on Monday,  
25 between the time Korey came in the trailer and the

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1 time Dr. Knowles arrived?

2 A It did not appear to me that he was in a lot of  
3 distress.

4 Q So he was in some distress but not a lot of  
5 distress?

6 A Right.

7 Q Did you believe that the distress he was in was  
8 related to the hot day?

9 MR. O'NEAL: Objection. Lack of  
10 foundation.

11 A It could be.

12 Q Okay. Anything else you observed or discussed  
13 with Korey before Dr. Knowles arrived?

14 A What I observed was that the reason I did not feel  
15 that he was in a great deal of distress was he  
16 didn't flop down on the table. His body was in a  
17 posture sitting on the edge of the table. He  
18 didn't try to, you know, just get me to the table,  
19 lay down, like this, and gasp.

20 Q Did he sit up?

21 A Yes. While I was there, he was sitting up.

22 Q Did you see him get off the table, move around?

23 A No.

24 Q Did you see him lay down on the floor?

25 A No.

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1 Q Okay. Anything else you observed or discussed  
2 with Korey before Dr. Knowles arrived on Monday?

3 A I can't recall anything.

4 Q Okay. And you stayed in the trailer the entire  
5 time Dr. Knowles was there on Monday?

6 A I think I left.

7 Q You were there part of the time Dr. Knowles was  
8 there?

9 A Part of the time, yes.

10 Q Tell me: When Dr. Knowles came in the trailer,  
11 what was the first thing he did?

12 MR. O'NEAL: Again, don't reveal  
13 treatment of Mr. Robbins.

14 THE WITNESS: Right.

15 A He looked at Mr. Robbins.

16 Q Did he talk to you?

17 A Dr. Knowles?

18 Q Yes.

19 A He talked to him and said that he thought he was  
20 okay.

21 Q Did Dr. Knowles talk to you?

22 A Yes. Talked to me. That's what he told me.

23 Q About Mr. Robbins?

24 A Yes.

25 Q Did you see Dr. Knowles look at Korey Stringer?

# **Paul Osterman Deposition Excerpts**

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STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

Kelci Stringer, individually, and as  
Personal Representative of the Estate  
of Korey Stringer, and as Trustee for  
the Heirs and Next-of-Kin of Korey  
Stringer, and Kodie Stringer, a Minor,  
through his Parent and Natural Guardian,  
Kelci Stringer, and Cathy Reed-Stringer  
and James Stringer,

Plaintiffs,

v.

Minnesota Vikings Football Club, LLC,  
and Dennis Green and Michael Tice and  
Fred Zamberletti and Chuck Barta and W.  
David Knowles, M.D. and Mankato Clinic,  
Ltd. and John Does 1 through 30 Natural  
Persons or Entities Whose Names or  
Identities are Unknown to Plaintiffs,

Defendants.

DEPOSITION OF

PAUL OSTERMAN

Taken May 15, 2002  
Commencing at 9:13 a.m.

REPORTED BY DEBRA MCCAULEY POLLARD  
PARADIGM REPORTING & CAPTIONING INC.  
1400 RAND TOWER  
527 MARQUETTE AVENUE SOUTH  
MINNEAPOLIS, MINNESOTA 55402  
(612) 339-0545

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1 down what happened.

2 Q I'm going to hand you what's marked as Barta  
3 Exhibit 27 and a pen for you to make some markings  
4 as we go. I'll give you a copy of this statement?

5 MR. DeMARCO: Should we maybe use a  
6 different-colored pen than Chuck. Is that the  
7 same one Chuck wrote on?

8 MS. ROSELLE: Yeah, but he's going to  
9 put his initials.

10 MR. O'NEAL: I still think a  
11 different-colored pen might be better. Let me see  
12 what I can do.

13 (A discussion was had off the  
14 record. Osterman Deposition  
15 Exhibit 49 was marked for  
16 identification.)

17 BY MS. ROSELLE:

18 Q I'm going to hand you also what's marked as  
19 Osterman Exhibit 49, which is a copy of Barta  
20 Deposition Exhibit 27, without any handwriting  
21 that was made by Mr. Barta. Okay.

22 MS. ROSELLE: And for the record, it's  
23 my understanding that the original of Exhibit 48  
24 will be typed and the typed copy of Exhibit 48  
25 will be put in today's record and the handwritten

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1 copy from Mr. Osterman will be returned to him by  
2 the court reporter. Is that correct?

3 MR. O'NEAL: That's correct. And it  
4 may be best if I can -- when we take a break, we  
5 can have it typed so we can accomplish that before  
6 the end of the day.

7 MS. ROSELLE: That would be fine. And  
8 also, for the record, because we didn't do this,  
9 the colored photographs are all under seal --

10 MR. DeMARCO: With the exception of the  
11 newspaper photograph.

12 MS. ROSELLE: And so since they were  
13 not -- they were referenced in the depositions but  
14 they were not actually marked as exhibits to the  
15 deposition, we would suggest that they just not be  
16 attached as copies and then we don't have to seal  
17 anything. Is that acceptable?

18 MR. O'NEAL: I'd have to go back and  
19 look at the agreement. I think that's probably  
20 acceptable, but let me think about that.

21 MR. DeMARCO: I think the only time we  
22 had to seal them is when we attached them as  
23 exhibits to a deposition.

24 MS. ROSELLE: Debra, if for any reason  
25 you're copying those photographs, they must be

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1 sealed.

2 THE REPORTER: Okay.

3 BY MS. ROSELLE:

4 Q Okay. The first sentence of Exhibit 48,  
5 Mr. Osterman, says, "I was standing in the middle  
6 of the first field when I heard the linemen call  
7 'Trainer.'" Could you tell me the date and time  
8 that you're referring to?

9 A That would have been Tuesday, right after the  
10 morning practice.

11 Q Okay. That would be Tuesday, July 31st, 2001?

12 A Correct.

13 Q Okay. And when you say just after the morning  
14 practice, what time are you referring to?

15 A I am not sure of the exact time. Practice had  
16 finished up and then I received the cell phone  
17 from Chuck. But I would say five, closer to maybe  
18 ten minutes is when I heard the call.

19 MR. O'NEAL: You mean after practice?

20 THE WITNESS: After practice finished,  
21 correct.

22 BY MS. ROSELLE:

23 Q I'd like you to look at Tice Deposition Exhibit 3  
24 and Exhibit 4 and tell me if, from looking at  
25 those documents, you can refresh your recollection

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1 as to when the morning practice on July 31st  
2 ended.

3 A Here it says 11:30 -- or 11:10, practice ends, but  
4 I don't recall if that was the time.

5 Q Okay. If you look at Exhibit 4, the third page of  
6 Exhibit 4, the page that says, at the bottom,  
7 Vikings 00933 --

8 A Okay.

9 Q -- does that help you remember when the morning  
10 practice ended?

11 A Not as far as time; just a general guideline. But  
12 no, I'm not sure.

13 Q Okay. And your best recollection is that it was  
14 what time?

15 A I really don't recall. It was sometime after  
16 11:00, but I never looked at my watch.

17 Q Okay. Now, it says you were standing in the  
18 middle of the first field. Could you mark on  
19 Osterman Exhibit 49 where you were standing?

20 A (Witness complies.)

21 Q Okay. And can you initial -- put your initials  
22 next to that.

23 A Okay. (Witness complies.)

24 Q It said you heard the linemen call trainer. Do  
25 you know the name of the lineman who called you?

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1 A No, I don't.

2 Q Okay. It says, "I ran toward the end of the field  
3 where the linemen were performing individual  
4 workouts." Could you mark on there where the  
5 linemen were performing individual workouts?

6 A Okay. Should I just draw a circle? Would that --  
7 or X?

8 Q Well, put "Individual Workouts."

9 A Okay. (Witness complies.)

10 Q Put your initials.

11 A (Witness complies.)

12 Q So that was still the same first field?

13 A Yes.

14 Q And then you say, "And saw Korey getting up from  
15 the ground after kneeling on one knee." Where did  
16 you see Korey?

17 A He was kind of off to the side of the players, but  
18 I don't know --

19 Q Okay. Could you mark where you saw him, where he  
20 was when you saw him?

21 A It was just kind of right to the side of where  
22 these (indicating) --

23 Q Okay. I need you to mark it.

24 MR. DeMARCO: "KS."

25 A (Witness complies.)

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1 Q Now, it says he was getting up from the ground  
2 after kneeling on one knee. Do you know why he  
3 was kneeling on one knee?

4 A No, I don't.

5 Q Had he been performing any type of exercise that  
6 he went down on a knee?

7 A I don't know what he was doing before that.

8 Q Okay. When you first looked at him, can you tell  
9 me exactly what you observed?

10 A I remember coming to him. He was, I believe, on  
11 the ground and then he quickly got up, and that's  
12 when I asked him, "Korey, how are you doing?" And  
13 then he ignored me and proceeded to go up and hit  
14 the big bag.

15 Q Okay. Was he sweating?

16 A Yes, he was.

17 Q Okay. Can you tell me where he was sweating, or  
18 was it everywhere?

19 A As far as I can -- just from observing, I seen  
20 sweat on his face and his arms.

21 Q Did you see his jersey wet?

22 A I don't know if he had his jersey on at that time.  
23 He might have had it off.

24 Q Do you know if he had a helmet on?

25 A No, he did not.

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1 Q Was his head wet?

2 A I don't know.

3 Q You don't know?

4 A I believe it was, but I'm not sure.

5 Q Now, when he took his jersey off, they have a  
6 T-shirt or something under them?

7 A Usually, they do, yes.

8 Q Do you recall the color of his T-shirt?

9 A I'm not sure exactly what color it was.

10 Q Okay. Do you recall whether it had sleeves?

11 A No, I don't.

12 Q Do you recall whether it was wet?

13 A I believe it was, but I'm not sure.

14 Q Was it wet throughout?

15 A I don't remember.

16 Q Okay. What kind of pants did he have on?

17 A I don't recall.

18 Q Were the pants wet?

19 A I don't know.

20 Q What kind of socks did he have on?

21 A I don't know.

22 Q Do you know if the socks were wet?

23 A No, I do not.

24 Q Do you know where his helmet was?

25 A No, I do not.

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1 Q Did he have a towel or anything with him?

2 A I do not know.

3 Q Did you see any wet towels near him?

4 A Not that I can recall.

5 Q Do you recall which knee he was down on?

6 A No, I don't.

7 Q When he was down on the knee, was he -- can I see  
8 Exhibit 49?

9 A (Witness complies.)

10 Q How far was he from Big Bertha?

11 A I'm not sure. I would estimate 20, 30 feet or so.

12 Q So it didn't look to you as though he had just hit  
13 Big Bertha and slipped as he was hitting it?

14 MR. O'NEAL: Well, I'll object to that  
15 as lacking in foundation.

16 BY MS. ROSELLE:

17 Q You may answer.

18 A I'm not sure what he was doing prior.

19 Q But he was 20 to 30 feet from Big Bertha?

20 A About. I'm not sure. I can show you a picture  
21 that shows a little bit better, but I'm not sure.

22 Q Okay. Are you looking at a picture?

23 A Yes.

24 Q And what is the number of that picture?

25 A 4-K.

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1 MR. O'NEAL: That's a McFarland  
2 exhibit.

3 BY MS. ROSELLE:

4 Q Okay. Does 4-K reflect where Korey was when you  
5 were called over?

6 A Yes. I am standing -- you can kind of see, with  
7 the sunglasses, right there (indicating).

8 Q Oh, okay. That's his head. Is this down on one  
9 knee, what you see in 4-K?

10 A I believe -- no, he's not down on one knee. But I  
11 believe what happened: He was down on the ground  
12 for a real short period of time and then he rose  
13 up on one knee.

14 Q So first he was down on the ground and then he  
15 rose up on one knee?

16 A Correct.

17 Q So the picture 4-K is before he rose up on one  
18 knee?

19 A Correct.

20 Q So when you first came over, he was on the knee or  
21 he was flat on his back?

22 A When I first came over, he was on his back.

23 Q Right, because you're standing right here in the  
24 picture.

25 A Correct.

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1 Q Do you know how long he had been laying on his  
2 back at the time you got there?

3 A No, I do not.

4 Q Did he have any kind of braces or rubber  
5 protection on any part of his body when you got  
6 there?

7 A I'd have to look at the picture.

8 Q (Indicating.)

9 A Not that I can see, but I'm not sure if he has  
10 anything on his -- I believe he had an ankle  
11 spatted, but I'm not sure.

12 Q Okay. Now, when you got over to him, who else was  
13 standing by him?

14 A D.J. Kearney.

15 Q Anyone else?

16 A Not that I can recall.

17 Q Can you see D.J. Kearney in that picture?

18 A Yes. He's the one -- like right there  
19 (indicating).

20 Q I see.

21 MS. ROSELLE: That's his leg.

22 BY MS. ROSELLE:

23 Q Okay. Do you know who this is (indicating)?

24 MR. DeMARCO: You might want to  
25 describe it for him.

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1 A That should be Corbin Lacina.

2 Q Okay. And who is next to him.

3 MR. O'NEAL: Ahead of him there?

4 A This gentleman?

5 Q (Moves head up and down.)

6 A I don't recognize offhand who that is.

7 MR. O'NEAL: It will be easier for the  
8 court reporter if you keep your hand away from  
9 your mouth.

10 THE WITNESS: Sorry.

11 BY MS. ROSELLE:

12 Q Is there anyone else you recognize in the picture?

13 A I'm not sure.

14 Q Okay. So you asked Korey how he was doing and he  
15 didn't answer you at all?

16 A No. He ignored me.

17 Q But he stood up and walked away from you and  
18 proceeded to take his turn and hit the big bag?

19 A Yes.

20 Q When he got up and walked away from you, how fast  
21 was he walking?

22 A I would say normal walking pace. I'm not sure if  
23 it was --

24 Q Was he slouched over?

25 A No, not that I can recall.

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1 Q And it was 20 to 30 feet from where he was to Big  
2 Bertha?

3 A Approximately.

4 Q Is Big Bertha the big bag?

5 A Yes. If you look in the picture, these guys are  
6 kind of in line and it would be kind of out in  
7 this area (indicating).

8 Q Okay. After hitting -- you watched him hit Big  
9 Bertha?

10 A Yes.

11 Q And did he hit it okay? I mean, did you see  
12 anything odd in the way he hit it?

13 A No. As far as I could tell, he was doing fine.

14 Q And then you say, "I advised Korey to go into the  
15 on-field first aid station to cool off." Did you  
16 follow him to where he hit Big Bertha?

17 A I was kind of standing a little bit back where  
18 these gentlemen -- like Corbin, I was kind of off  
19 in this area right here, just watching him. And  
20 then he hit the bag and then he walked a little  
21 bit by the bag. I'm not sure what he was doing  
22 next, if he was going to go in, but I thought it  
23 would be a good idea just to take him into this --  
24 we had a first aid trailer.

25 Q So did you walk over to him?